

III. REMARKS

Claims 1-31 are pending in this application. By this amendment, claims 1, 2, 9, 14, 17, 20 and 24 have been amended. Applicants are not conceding in this application that those claims are not patentable over the art cited by the Office, as the present claim amendments and cancellations are only for facilitating expeditious prosecution of the subject matter. Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the original claims in a subsequent patent application that claims priority to the instant application. Reconsideration in view of the following remarks is respectfully requested.

In the Office Action, claims 2, 9 and 20 are rejected under 35 U.S.C. §112, second paragraph as allegedly failing to set forth the subject matter which applicants regard as their invention. Claims 1 and 27 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Jason (U.S. Patent No. 6,636,520), hereafter “Jason,” in view of Zhou (J. Zhou, “Further analysis of the Internet key exchange protocol”, Computer Communications, Volume 23, Issue 17, 11/1/2000) and further in view of Pfleeger (Charles P. Pfleeger, “Security in computing”, 2nd edition, 1996, ISBN:0133374866), hereafter “Pfleeger.” Claims 5-6, 12 and 28-29 are rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Jason in view of Zhou and Pfleeger and further in view of Noehring (U.S. Patent Pub. No. 2002/0188871), hereafter “Noehring.”

A. REJECTION OF CLAIM 1-31 UNDER 35 U.S.C. §112

The Office has asserted that claims 2, 9 and 20 are indefinite for failing to particularly

point out and distinctly claim the subject matter which applicant regards as the invention.

Applicant has amended the claims to more specifically define the first node of which the Office objects. Accordingly, Applicant requests that the rejection be withdrawn.

B. REJECTIONS OF CLAIMS 1-32 UNDER 35 U.S.C. §102(e) AND 35 U.S.C. §103(a)

With regard to the 35 U.S.C. §103(a) rejections, Applicant asserts that the references cited by the Office do not teach or suggest each and every feature of the claimed invention. For example, with respect to independent claim 1, and similarly claimed in claims 9, 14, 17, 20 and 24, Applicant submits that the cited references fail to teach or suggest a filter detection system for searching for IKE traffic permit filters in a gateway of the VPN. The Office admits that Jason and Zhou fail to disclose this feature but instead relies on Pfleeger. However, Pfleeger does not mention a VPN and does not specifically mention IKE traffic. To this extent, the teachings regarding firewall management of Pfleeger would not enable one to search for IKE traffic permit filters on a VPN gateway. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

With further respect to independent claims 1, 9, 14, 17, 20 and 24, Applicant submits that the cited references fail to teach or suggest an IKE traffic enablement system for automatically allowing IKE traffic from outside the VPN to flow into the VPN if the IKE traffic permit filters are not detected. The Office attempts to cobble three completely unrelated references in its argument to the contrary. Jason, while teaching VPN does not disclose IKE traffic in the VPN or traffic permit filters. Similarly, Zhou teaches IKE without mentioning VPN or filtering. In addition, Pfleeger fails to teach either VPN or IKE traffic as part of its packet level filtering. As

such, the combination of the references cited by the Office fail to enable one skilled in the art to perform the functions of the traffic enablement system of the claimed invention. Accordingly, Applicant respectfully requests that the Office withdraw its rejection.

With respect to dependent claims, Applicant herein incorporates the arguments presented above with respect to the independent claims from which the claims depend. Furthermore, Applicant submits that all dependant claims are allowable based on their own distinct features. Since the cited art does not teach each and every feature of the claimed invention, Applicant respectfully requests withdrawal of this rejection.

IV. CONCLUSION

In addition to the above arguments, Applicant submits that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicant does not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter. Additionally, Applicant does not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicant reserves the right to present such arguments in a later response should one be necessary.

In light of the above, Applicant respectfully submits that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicant's undersigned representative at the number listed below.

Respectfully submitted,

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